

Attachment A
Must Be Jointly Submitted Within 14 Days

Requests for Production/Interrogatory:	Objecting Party's Objection/Answer:	Requesting Party's Response to Objection:	The Court's Ruling
<p>RFP No. 3: "All documents relating in any way to . . ."</p> <p>[Requesting party's request with brief description, if necessary.]</p>	<p>Objection: "The objecting party objects to the request because, <i>e.g.</i>, work product and/or attorney/client privilege."</p> <p>Format for Objection: Each item or question subject to the request and objected to must be listed. No boilerplate answers, and no "briefing." Your chart should mirror what your notes would be for an oral hearing with three bullet points:</p> <ul style="list-style-type: none"> • Rule you are invoking; • Case that speaks to <u>this</u> dispute, not one speaking generally about discovery rules; and, • Facts that support your position. 	<p>Response: "The objecting party's argument is misguided because . . ."</p> <p>Format for Response: The format for the response is the same as the format for the objection. Respond to each item or question objected to. No boilerplate responses and no "briefing." Respond in the same three bullet points:</p> <ul style="list-style-type: none"> • Rule you are invoking; • Case that speaks to <u>this</u> dispute, not one speaking generally about discovery rules; and, • Facts that support your position. 	